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FROM THE DESK OF

## Michael and Kristin Peca

November 2, 2020


The Honorable Joseph F. Bianco  
U.S. District Court for the Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Dear Judge Bianco,

We are writing you again – this time regarding the upcoming sentencing of Tommy Constantine. There are a few important points we want you to consider before the actual sentencing date arrives.

As you're well aware, Tommy Constantine was convicted on all 7 counts he was indicted on. And, he committed even more fraud/theft in multiple other instances, some of which were referenced during the trial (i.e. The Palms-Vegas). We point this out to show you that Constantine's criminal actions were not singular, rather planned and carried out over several years. In fact, you may or may not be aware that Constantine was previously sentenced to 6 years in federal prison, and served approximately 3 years.

Con-men, like Tommy Constantine, are good at conning people...including smart people. Sometimes even Judges can be deceived. Deceived into thinking a defendant was, or can be, rehabilitated. That is because Con-men, like Tommy Constantine, are good at acting innocent/harmless and faking remorse when needed. Tommy Constantine has already done this. He has conned a Judge. A federal Judge. When Constantine was convicted of his first federal crime and sentenced to 6 years in prison, he fooled the Judge into thinking that he 'wasn't that bad', that he was roped into committing the crime, that he was somehow a victim of the main perpetrator (just like he is doing now with Kenner), that he was truly remorseful, and that he would never commit another crime again. In fact, Tommy Constantine shared a letter, that the Judge wrote on his behalf, with us (a copy of the letter is attached). We were floored at how convincing Tommy must've been at deceiving the court....enough so that he hoodwinked the judge into thinking that he had already learned from his "singular" mistake, and that he would NEVER appear before any criminal court as a defendant



again. Hard to believe that Constantine had completely fooled the Judge, because he clearly had not learned his lesson, and was not remorseful, as he went on to commit many serious, crimes again. And, in fact, not only was he not remorseful, he couldn't even admit he had done anything wrong, even after being found guilty and serving years in federal prison. In a May 8th 2009 email to us (a copy of which is attached), Tommy Constantine said, "I served 3 years in prison strictly on principle." And, from the letter that the Judge wrote on Tommy Constantine's behalf (then known as Tommy Hormovitis ...before he changed his last name): This is a direct quote from Judge Neville of Illinois, "...I believe Thomas Hormovitis has learned from this singular mistake, that he will resume his career as a race car driver, and that he will NEVER AGAIN APPEAR BEFORE ANY CRIMINAL COURT AS A DEFENDANT." Clearly, and unbelievably, Tommy Constantine had completely fooled Judge Neville into thinking he was remorseful... that he was a good guy who just made a "singular" mistake, and that he'd never commit another crime again. Your Honor, I ask that the court not be fooled again by Tommy Constantine, and that other families will be protected from his repeat criminal activity.

Studies explain the dangers of high-risk, repeat offenders. Constantine is high risk. The fact that he served considerable time in federal prison wasn't enough to deter him from committing serious crimes again. And, Constantine has already established himself to be a repeat offender. Furthermore, the data that exists indicates that these high-risk, repeat offenders need to be incarcerated in prisons for long periods of time to move them beyond their peak years of criminality.

Your Honor, when Tommy Constantine asks you to consider the fact that he has kids, please consider that he had no regard for the fact that we had kids when he stole from us on multiple occasions over many years. Please consider that many of Constantine's other victim's also have children. And, that didn't stop him from stealing and harming family after family. Tommy Constantine's crimes will affect generations to come....in many families. Your Honor, if Constantine truly ever had any concerns for his children dealing with their father in prison, he would not have chosen to selfishly start a family *AFTER* he was arrested and charged with several serious crimes (when he knew he faced a lengthy jail sentence). That goes to his character: He uses everybody for his own benefit. Sadly, even his fiancée and children. And, while we feel badly that his kids are added to the list of innocent victims of Tommy Constantine's actions, it goes to show how selfish he truly is, as his choice of timing to have children was clearly made in attempt to gain sympathy for a lesser sentence. He was not concerned for his own kids when he had them, and was much less concerned for the children of families he has victimized.

Tommy Constantine is indifferent to having harmed and stolen from so many victims. He lacks a sense of moral responsibility and social conscience. Up until this point there has been no remorse, no apology, and no attempt to make restitution. Constantine is a habitual offender, a career criminal. These narcissistic and sociopathic characteristics all point to him never changing. If let out, Constantine will continue to con, scheme and steal. **Tommy Constantine does not deserve a THIRD opportunity to harm another person!**

We plan on attending the upcoming sentencing on November 10th, to give our victim impact statement and to provide you with more pertinent information regarding Constantine's actions and the effects it had on us. Having said that, thank you for taking the time to read this letter and for taking it into consideration when deciding on a sentencing range. (As always, if this letter is going to be posted, please make sure our contact information is blacked out. We appreciate it.)

Sincerely yours,



Michael and Kristin Peca



CIRCUIT COURT OF COOK COUNTY

CHAMBERS OF  
RICHARD E. NEVILLE  
JUDGE

CHICAGO, ILLINOIS 60602

September 16, 1993

In Re: Thomas Constantine Hormovitis  
State of Illinois  
Department of Corrections

To Whom It May Concern:

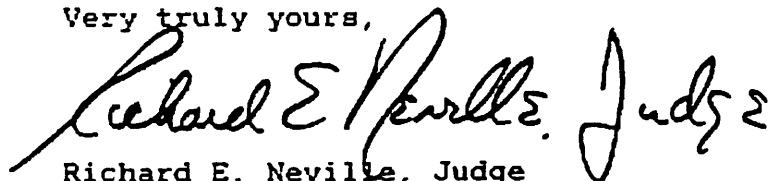
Thomas Hormovitis' case was assigned to me as the trial judge in 1989. Because of the extensive litigation involved in the case, it was not until 1993 that he pled guilty. I sentenced him to the minimum which the law allowed -- 6 years. During the time he and his case were before me I observed him carefully, and from the facts I now know of the case, I believe him to be truly remorseful for the pain he has caused his family, as well as disgusted with himself for having stupidly blighted what promised to be a bright future and promising career.

Rarely, if ever, have I seen in my court a family as supportive of a defendant as is his. Nearly every day the case appeared on my call, no matter how insignificant the proceedings, his parents and his siblings appeared with him. For these and other reasons I believe Mr. Hormovitis would have successfully completed a term of probation no matter what special conditions I had attached thereto, and I would have sentenced him to probation with community service had the law permitted it. But the Illinois Statutes demand incarceration and so I sentenced him to the minimum the law permits.

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Presently, I understand, he is housed in Centralia, and this works a considerable hardship on his family who visits him each week. With due respect for the prison authorities, I recommend as early a release as the law allows, as I believe Thomas Hormovitis has learned from this singular mistake, that he will resume his career as a race car driver, and that he will never again appear before any criminal court as a defendant. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Richard E. Neville, Judge". The signature is written in a cursive, flowing style.

Richard E. Neville, Judge  
Circuit Court of Cook County,  
Illinois

REN/dmp

From: [REDACTED]

To: [REDACTED]

Subject: Fwd: quote from judge

Date: Thu, Oct 29, 2020 3:20 pm

Attachments: Moreau\_Palms\_contract\_-\_SIGNED\_2.pdf (359K), EPSON001.002.PDF (1388K), EPSON003.PDF (299K)

-----Original Message-----

From: Tommy Constantine <tommy@eufora.com>

To: [REDACTED]

Sent: Fri, May 8, 2009 1:16 pm

Subject: Fw: Bad Press

----- Original Message -----

From: Tommy Constantine

To: Evans, Michael

Sent: Thursday, April 30, 2009 11:57 AM

Subject: Bad Press

Michael:

As you may have been made aware by now, there has been some pretty bad press circulating about me. I would like to respond with the following information. I also hope that you and your colleagues put as little validity in the kind of information that is being circulated about me as my other friends and business associates do, particularly when it is being circulated by these types of publications. In any case, I just wanted you to have the facts and hear the truth directly from me. The two court documents attached, articulate the facts of my previous conviction and my legal name change. My criminal conviction was a one-time drug charge which originated almost 21 years ago. ~~It was not the primary person involved in the case. As far as my involvement was concerned, it was a one-time occurrence where I was simply helping my childhood friend~~ (the kid my mom told me to stay away from). He told me he was in trouble and needed my help. He literally called me on one afternoon and asked me to help him...I agreed, kissed my girlfriend good bye and proceeded to put myself, my family and my girlfriend (of three years) though an almost insurmountable amount of stress and humiliation. One of the many losses that I and others suffered as a result of my involvement on this day, was that my girlfriend committed suicide during my trial. Clearly I am still paying for this mistake today.

Even though I was not the primary person involved in the crime, I accepted the fact that I had made the decision to go along with my friend and rather than "roll over" on my him (as many card carrying gangsters who actually chose that life did to save their own ass), I took responsibility for my actions and faced the music (so to speak). Many people do not consider the issue of loyalty, personal strength and character in this type of situation, but I probably don't have to tell you what it takes for one to face the kind of adversity that I was facing and not divert responsibility. ~~I served three years in prison strictly on principle.~~ I am not bragging here and its nothing to be proud of. I am just saying that if I had elected to screw my friend (more than he had already screwed himself) by cooperating and didn't take responsibility for my own actions, right now no one would ever know this had happened to me or how I had handled it...except me. They also couldn't use this to harm my friend Phil.

I legally changed my name in 1998 (4 years after my release) solely for the purpose of having a more pronounceable name for the racing media to further my career. It was *not* to hide my past. Constantine is my legal middle name and I simply chopped off my last name (Hormovitis) which sounded like a sexually transmitted disease (haha). I have been very open about my past to both friends and business associates. I am not ashamed of it.

The allegation that I am being sued for fraud by hockey players is also totally false. A hockey player, who *is* in fact suing Phil for fraud (wrongly in my opinion), purchased a condo at the Palms from me and breached the agreement by not following through with the purchase. The contract, a portion of which I have also attached and highlighted for you, dictates that if he does not close for any reason, in addition to other damages, I would be entitled to keep his deposit. In spite of the fact that I lost other opportunities to sell the condo (when the market was good), I elected to not pursue a lawsuit against him for additional damages. What I received for my graciousness was a lawsuit seeking the deposit back and getting dragged through the mud by the media.

As far as the press is concerned, basically, the lawyer for the hockey players is a slimy NY lawyer that threatened to use

SHIRING  
TAKING RESPONSIBILITY

his personal media contacts in NY (to damage my and Phil's image), as leverage to get me to return the deposit. I told him to go fuck himself and this is why this is happening. They are also manipulating the facts of my past in the media and using the association between myself and Phil to discredit him as an advisor. This is nothing short of a witch hunt which is regurgitating 20 year old information and misrepresenting current facts.

As you know, I have invested a great deal of time and money in our efforts to partner with MGM Mirage and although I am certain that this bad press is already being used against me, I wanted at least for you to know the real story directly from me, so as to mitigate any negative impact this may have between your company and I and any potential deal. My friends and associates could care less about these recent efforts to screw me, as they have also been made aware of the facts...but I wanted you to know the truth as well.

Sincerely,

Tommy Constantine